

**FILED**

July 25, 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**UNITED STATES DISTRICT COURT**

for the

Western District of Texas

BY: Joseph Hinojos  
DEPUTYUnited States of America  
v.

Aaron BALDERRAMA

Case No. 4:23-MJ-453

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 07/20/2023 in the county of Presidio in the  
**WESTERN DISTRICT OF TEXAS**, the defendant(s) violated:*Code Section**Offense Description*

21 U.S. Code § 952

Importation of 8 kilograms of cocaine

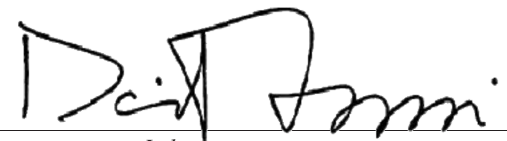
21 U.S. Code § 841(a)(1)

Possession with intent to distribute 8 kilograms of cocaine

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.**RAVEN N  
WOODY**Digitally signed by RAVEN  
N WOODY  
Date: 2023.07.21 11:50:25  
-05'00'*Complainant's signature*

Raven Woody, HSI Special Agent

*Printed name and title*Complaint sworn to telephonically on  
July 24, 2023 at 09:00 AM and signed  
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**Date: 07/25/2023City and state: Pecos, Texas*Judge's signature*

Honorable Judge David B. Fannin

*Printed name and title*

AFFIDAVIT

On July 20, 2023, at approximately 3:28 pm., Aron BALDERRAMA attempted entry into the United States from Mexico through the Presidio Texas Port of Entry in the Western District of Texas. BALDERRAMA was the driver of a gray Chevy Silverado truck, and he was the sole occupant in the vehicle.

While conducting primary inspections, Customs and Border Protection Officers (CBPO) made contact with BALDERRAMA. BALDERRAMA stated he only had a couple bags of cheese in his vehicle and provided a negative customs declaration. The CBPOs noticed there were four wheels of cheese in the vehicle. BALDERRAMA stated he was traveling to Odessa, Texas. The truck was referred for secondary inspection.

In secondary inspection, the CBPO obtained a second negative customs declaration from BALDERRAMA. During secondary inspection, BALDERRAMA appeared nervous when the CBPOs handled the cheese in his vehicle. BALDERRAMA was escorted to a separate area, and the CBPOs brought the cheese to an X-RAY machine. During the X-RAY, anomalies were seen in the center of the wheels of cheese that resembled the shape of bricks. During a visual inspection of the wheels of cheese, the CBPOs noticed bulges in the center. An intensive inspection revealed seven (7) bundles concealed within the four (4) wheels of cheese. The bundles had an approximate weight of 8 kilograms. The bundles were probed, and a white substance was extracted. The substance field tested positive for the properties of cocaine.

Homeland Security Investigations (HSI) Special Agents (SA) responded and escorted BALDERRAMA to the HSI Presidio interview room. BALDERRAMA was given his Miranda Warning in the Spanish language. BALDERRAMA stated he understood his rights and made a statement without the presence of an attorney. The interview was recorded.

BALDERRAMA stated he entered into an agreement in Chihuahua, Chihuahua, Mexico with an unidentified individual. BALDERRAMA agreed to transport the cheese wheels containing cocaine into the United States for the unidentified individual. BALDERRAMA added that he would be paid \$1000 per cocaine brick upon successful delivery in Odessa, Texas.

This affidavit is being submitted for the limited purpose of establishing probable cause. I have not included every fact known to me concerning this investigation.

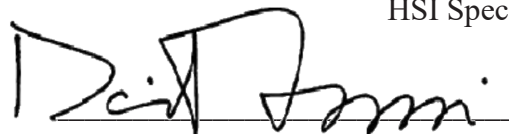
I make this affidavit on the basis of my personal knowledge and information furnished to me by other law enforcement officers.

RAVEN N WOODY

Digitally signed by RAVEN N  
WOODY Date: 2023.07.21

11:50:58 -05'00'

Raven Woody  
HSI Special Agent

  
Honorable Judge David Fannin